

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ANA R. OLIVELLA RIVERA

Plaintiff

v.

POPULAR LEASING AND RENTAL, INC.,
ET AL.

Defendants

* CIVIL NO.: 98-2267 (JAG)

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JURY TRIAL DEMANDED

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MOTION IN OPPOSITION TO REQUEST FOR ADDITIONAL
TIME TO OPPOSE MOTION IN LIMINE

TO THE HONORABLE COURT:

COME NOW defendants PREFERRED RISK INSURANCE COMPANY (erroneously denominated Puerto Rican American Insurance Company) and BANCO POPULAR DE PUERTO RICO, represented by the undersigned attorneys, and before the Honorable Court respectfully tenders this proposed pre-trial order:

1. Plaintiff filed a motion requesting an additional term of fifteen (15) days to oppose our motion in limine.

2. Our motion in limine is based on the fact that plaintiff was given a term to submit copy of the documents that were belatedly announced by that party and, to this date, plaintiff has not submitted them.

3. Plaintiff keeps requesting extensions of time when all that has to be done is to submit the documents so that defendants can examine them and conduct whatever discovery may be necessary

regarding those documents.

4. This court has been more than reasonable in allowing plaintiff an opportunity to submit the documents but there has to be a limit to plaintiff's requests for additional extensions. After all, plaintiff has only been requested to provide to defendants with copy of the documents. A large amount of workload is not a valid excuse since all that plaintiff has to do is to submit copy of the documents. Presumably, copy of those documents must be readily available since they were announced in the pre trial as plaintiff's evidence and plaintiff alleges that they were provided to defendants early in the proceedings, which defendants deny. There is simply no excuse for plaintiff's non compliance.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Rafael A. Oliveras López, Esq.; David López Pumarejo, Esq.**

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 8th day, of February, 2007.

s/ Ana María Otero
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Attorney for defendants
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and Banco Popular de Puerto Rico
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